

1 CHRISTOPHER CHIOU, State Bar No. 233587  
2 WILSON SONSINI GOODRICH & ROSATI  
3 cchiou@wsgr.com  
4 633 West Fifth Street  
5 Los Angeles, CA 90071-2048  
6 Telephone: (323) 210-2900  
7 Facsimile: (866) 974-7329

5 *Attorneys for Defendants YouTube, LLC and Google LLC*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

## OAKLAND DIVISION

1 Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), the Parties submit  
 2 this stipulation extending the time to make an omnibus sealing filing.

3 On May 23, 2025, the Parties filed a Joint Letter Brief re YouTube's Search and Production  
 4 from Noncustodial Source "B." Dkt. 1974. The Parties filed a joint temporary sealing motion  
 5 pursuant to ECF 341 regarding material in the brief.

6 Section II.C of the Court's Order Setting Sealing Procedures permits the Parties, by  
 7 stipulation, to extend the time to file an Omnibus Stipulation or Omnibus Motion to 21 days after  
 8 the conclusion of briefing. The Parties agree that extending the time to make the omnibus filing is  
 9 appropriate.

10 Accordingly, the Parties stipulate that the deadline to file an Omnibus Stipulation and/or  
 11 Omnibus Motion is extended to June 13, 2025.

12 **IT IS SO STIPULATED AND AGREED**, through Counsel of Record.

13

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15

16 Dated: \_\_\_\_\_

17 Honorable Peter H. Kang  
 United States District Judge

18

19

20 Dated: June 6, 2025

Respectfully submitted,

21

**WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation**

22

/s/ Christopher Chiou

23

Christopher Chiou (State Bar No. 233587)

24

Wilson Sonsini Goodrich & Rosati

25

cchiou@wsgr.com

26

Matthew K. Donohue (State Bar No. 302144)

27

mdonohue@wsgr.com

28

633 West Fifth Street

Los Angeles, CA 90071-2048

Telephone: (323) 210-2900

1 Brian M. Willen, *pro hac vice*  
2 Wilson Sonsini Goodrich & Rosati  
3 bwillen@wsgr.com  
4 1301 Avenue of the Americas, 40th Floor  
5 New York, New York 10019  
6 Telephone: (212) 999-5800

7 Lauren Gallo White (State Bar No. 309075)  
8 Wilson Sonsini Goodrich & Rosati  
9 lwhite@wsgr.com  
10 Andrew Kramer (State Bar No. 321574)  
11 akramer@wsgr.com  
12 Carmen Sobczak (State Bar No. 342569)  
13 csobczak@wsgr.com  
14 One Market Plaza, Spear Tower, Suite 3300  
15 San Francisco, CA 94105  
16 Telephone: (415) 947-2000

17 **MORGAN, LEWIS & BOCKIUS LLP**

18 Yardena R. Zwang-Weissman (SBN 247111)  
19 yardena.zwang-weissman@morganlewis.com  
20 300 South Grand Avenue, 22nd Floor  
21 Los Angeles, CA 90071-3132  
22 Telephone: (213) 612-7238

23 Brian Ercole (*pro hac vice*)  
24 brian.ercole@morganlewis.com  
25 600 Brickell Avenue, Suite 1600  
26 Miami, FL 33131-3075  
27 Telephone: (305) 415-3416

28 Stephanie Schuster (*pro hac vice*)  
29 Stephanie.schuster@morganlewis.com  
30 1111 Pennsylvania Avenue NW  
31 Washington, DC 20004-2541  
32 Telephone: (202) 373-6595

33 **WILLIAMS & CONNOLLY LLP**

34 Joseph G. Petrosinelli  
35 jpetrosinelli@wc.com  
36 Ashley W. Hardin  
37 ahardin@wc.com  
38 680 Maine Avenue, SW  
39 Washington, DC 20024  
40 Telephone.: (202) 434-5000

41 *Attorneys for Defendants YouTube, LLC,*  
42 *and Google LLC*

1 Dated: June 6, 2025

/s/ *Lexi J. Hazam*  
LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

9 Co-Lead Counsel

10 CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 Challenger Road, 6<sup>th</sup> floor  
11 Ridgefield Park, NJ 07660  
12 Telephone: 973-639-9100  
cseeger@seegerweiss.com

13 Counsel to Co-Lead Counsel and Settlement  
14 Counsel

15 JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
16 155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
17 Telephone: 415-986-1400  
jennie@andrusanderson.com

18 Liaison Counsel

19 JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
20 234 Commerce Street  
Montgomery, AL 36103  
21 Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

22 EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
23 220 W. Garden Street, 9<sup>th</sup> Floor  
Pensacola, FL 32502  
Telephone: 850-316-9100  
ejeffcott@forthepeople.com

24 Federal/State Liaison Counsel

1  
2 MATTHEW BERGMAN  
3 **SOCIAL MEDIA VICTIMS LAW CENTER**  
4 821 Second Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

5 JAMES J. BILSBORROW  
6 **WEITZ & LUXENBERG, PC**  
7 700 Broadway  
New York, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

8  
9 JAYNE CONROY  
10 **SIMMONS HANLY CONROY LLP**  
11 112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
Telephone: 917-882-5522  
jconroy@simmonsfirm.com

12 ANDRE MURA  
13 **GIBBS LAW GROUP, LLP**  
14 1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

15  
16 ALEXANDRA WALSH  
17 **WALSH LAW**  
18 1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

19 MICHAEL M. WEINKOWITZ  
20 **LEVIN SEDRAN & BERMAN, LLP**  
21 510 Walnut Street Suite 500  
Philadelphia, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

22 Plaintiffs' Steering Committee Leadership

23  
24 RON AUSTIN  
25 **RON AUSTIN LAW**  
26 400 MANHATTAN BLVD  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

27 PAIGE BOLDT

**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
[PBoldt@WattsGuerra.com](mailto:PBoldt@WattsGuerra.com)

**THOMAS P. CARTMELL  
WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701 1100  
[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

**SARAH EMERY  
HENDY JOHNSON VAUGHN EMERY, PSC**  
2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
[semery@justicestartshere.com](mailto:semery@justicestartshere.com)

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
[carrie@cagoldberglaw.com](mailto:carrie@cagoldberglaw.com)

**RONALD E. JOHNSON, JR.**  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100  
Louisville, KY 40202  
Telephone: 859-578-4444  
[rjohnson@justicestartshere.com](mailto:rjohnson@justicestartshere.com)

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &**  
**OVERHOLTZ, PLLC**  
17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
[mliu@awkolaw.com](mailto:mliu@awkolaw.com)

**JAMES MARSH  
MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th floor  
New York, NY 10001-2170  
Telephone: 212-372-3030  
[jamesmarsh@marshlaw.com](mailto:jamesmarsh@marshlaw.com)

**HILLARY NAPPI  
HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016

1 Telephone: 212.213.8311  
2 hnappi@hrsclaw.com

3 EMMIE PAULOS  
4 **LEVIN PAPANTONIO RAFFERTY**  
5 316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

6 RUTH THI RIZKALLA  
7 **THE CARLSON LAW FIRM, P.C.**  
8 1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

9 ROLAND TELLIS  
10 DAVID FERNANDES  
11 **BARON & BUDD, P.C.**  
12 15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

13 MELISSA YEATES  
14 JOSEPH E. MELTZER  
15 **KESSLER TOPAZ MELTZER & CHECK, LLP**  
16 280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

17 DIANDRA "FU" DEBROSSE ZIMMERMANN  
18 **DICELLO LEVITT**  
19 505 20<sup>th</sup> St North Suite 1500  
20 Birmingham, Alabama 35203  
21 Telephone: 205.855.5700  
fu@dicellosevitt.com

22 Plaintiffs' Steering Committee Membership  
23 *Attorneys for Plaintiffs*

## ATTESTATION

I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 6, 2025

*/s/ Christopher Chiou*

Christopher Chiou